

Submission on National Aviation Policy Green Paper

This submission is focused on **Part B Issues and Options for Safeguards** and in particular the discussion around aircraft noise.

Addressing the questions asked first:

Does the ANEF system provide an effective basis for planning in noise affected areas?

Yes but it should be supplemented with the N70 measure and traffic exposure graphs like those produced by the Airservices Australia Noise Monitoring Stations (which show the absolute number of events at various noise levels during day and night time hours).

Its worth noting that it is extraordinarily difficult to obtain a current ANEC map for an Australian Airport. Even if the standards are changed in no other way, these plans should be publicly available from a disinterested regulator rather (as they currently are) only being available after significant negotiation with the airport operator.

How effective is the ANEF system as a land use planning standard for greenfield developments around airports?

Probably but see the answer to the next question.

Are the acceptable levels of aircraft noise for particular developments identified in AS2021 consistent with current community expectations?

No. If all the levels were lowered by 5 points then they would more closely match community expectations.

How can the current planning arrangement to address developments in noise-affected areas around airports and under flight paths be improved to take account of community expectations, while also providing for the reasonable growth of aviation activity at airports?

By ensuring that conditionally approved construction includes appropriate noise insulation.

For developments around the major capital city and freight airports, should state governments have to refer residential development within a defined buffer zone to the Commonwealth Transport Minister or Secretary for approval?

No but the criteria for approval and the noise insulation required should be unequivocally specified.

Other matters

A concern I have with the discussion paper is that it is focused on new development. There are many existing buildings under high volume flight paths with rapidly increasing traffic. It is all well and good to make rules that would prevent those buildings being put there if it were a greenfield site but the reality is that most of the 'problem' airports are not greenfield sites.

There needs to be a significant effort directed towards establishing standards for rectification of existing buildings to bring them to an acceptable level of noise tolerance. Items which should be considered as part of these guidelines should be:

- What do the Australian workplace standards specify as acceptable levels of noise in the workplace? Many schools and other workplaces exist under high traffic flights paths. In many instances, air traffic noise is breaching relevant standards on a minute by minute basis.
- Standardised fit out requirements for existing buildings such as the type of glazing or other insulation measures required.
- A cost sharing model which ensures that the properties with the highest need are rectified in a timely fashion by the airport operator. The model would ensure that other less affected buildings share the rectification costs between the operator and the owner.

Standards on existing structures are required and should be developed using a public consultation process. Restricting the discussion to new buildings renders the exercise largely pointless.